

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence of  
the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington.

June 1st 2022  
By Ravi Subramanian, Clerk  
Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff

v.

KARA SUNEVA ALLEN, a/k/a KARA  
SUNEVA MITCHELL,  
Defendant.

NO. **CR22-078 RAJ**  
INDICTMENT

The Grand Jury charges that:

At all times relevant to this Indictment:

***Relevant Individual and Entity***

1. Defendant KARA SUNEVA ALLEN (a/k/a KARA SUNEVA  
MITCHELL) was a resident of Ferndale, Washington.

2. Keepin Up With Kara LLC, a business specializing in selling counterfeit  
handbags, jewelry, and other accessories (among other items), was incorporated on June  
29, 2021. ALLEN was the company's registered agent, and ALLEN and her husband  
were the company's governors. The business operated out of two adjoining suites within  
a warehouse in Ferndale, Washington.

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8. Hermès International (“Hermès”) was a corporation organized under the laws of France, having its principal place of business in Paris, France. Hermès owned the company’s trademarks in the United States.

9. Louis Vuitton Malletier (“Louis Vuitton”) was a Société par actions simplifiée (SAS) organized under the laws of France, having a principal place of business in Paris, France. Louis Vuitton owned the company’s trademarks in the United States.

10. Prada S.p.A. (“Prada”) was a corporation organized under the laws of Italy and headquartered in Milan, Italy. The company’s trademarks in the United States were owned by Prada S.A., an entity with a registered office in Luxembourg.

11. The above-referenced companies designed, manufactured, and marketed goods—including handbags, wallets, belts, and other accessories—and owned the following trademarks:

Company	USPTO Registration No.	Description
Chanel	1733051	“CHANEL” Word Mark
Chanel	1734822	“CC” Word Mark
Gucci America, Inc.	5073022	“GG” Word Mark
Hermès	3939358	Design Mark for handbag
Hermès	4278653	“HERMÈS” Word Mark
Louis Vuitton	0297594	“LV” Word Mark and Design
Louis Vuitton	1990760	“Louis Vuitton” Word Mark
Louis Vuitton	2361695	“LV” Word Mark
Prada S.A.	1873854	“PRADA MILANO DAL 1913” Word Mark and Design
Prada S.A.	4843465	“PRADA MILANO DAL 1913” Word Mark and Design

**COUNT 1**

**(Trafficking in Counterfeit Goods or Services)**

12. The allegations set forth in paragraphs 1 through 11 are re-alleged and incorporated by reference as if set forth in full herein.

13. On or about December 9, 2021, in Whatcom County, within the Western District of Washington, and elsewhere, KARA SUNEVA ALLEN (a/k/a KARA SUNEVA MITCHELL) did intentionally traffic in goods, specifically, a Louis Vuitton handbag and accessories, and, on and in connection with such goods, knowingly used counterfeit Louis Vuitton marks identical to, and substantially indistinguishable from, genuine marks registered on the principal register in the USPTO and in use during ALLEN's trafficking, and the use of such counterfeit marks was likely to cause confusion, to cause mistake, and to deceive.

All in violation of Title 18, United States Code, Sections 2320(a)(1) and 2.

**COUNT 2**

**(Trafficking in Counterfeit Goods or Services)**

14. The allegations set forth in paragraphs 1 through 11 are re-alleged and incorporated by reference as if set forth in full herein.

15. On or about February 23, 2022, in Whatcom County, within the Western District of Washington, and elsewhere, KARA SUNEVA ALLEN (a/k/a KARA SUNEVA MITCHELL) did intentionally traffic in goods, specifically, an Hermès handbag, a Prada card wallet, and a Gucci belt, and, on and in connection with such goods, knowingly used counterfeit Hermès, Prada, and Gucci marks identical to, and substantially indistinguishable from, genuine marks registered on the principal register in the USPTO and in use during ALLEN's trafficking, and the use of such counterfeit marks was likely to cause confusion, to cause mistake, and to deceive.

All in violation of Title 18, United States Code, Sections 2320(a)(1) and 2.

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**COUNT 3****(Trafficking in Counterfeit Goods or Services)**

16. The allegations set forth in paragraphs 1 through 11 are re-alleged and incorporated by reference as if set forth in full herein.

17. On or about May 2, 2022, in Whatcom County, within the Western District of Washington, and elsewhere, KARA SUNEVA ALLEN (a/k/a KARA SUNEVA MITCHELL) did intentionally traffic and attempt to traffic in goods, specifically, Chanel and Louis Vuitton accessories, and, on and in connection with such goods, knowingly used counterfeit Chanel and Louis Vuitton marks identical to, and substantially indistinguishable from, genuine marks registered on the principal register in the USPTO and in use during ALLEN's trafficking and attempted trafficking, and the use of such counterfeit marks was likely to cause confusion, to cause mistake, and to deceive.

All in violation of Title 18, United States Code, Sections 2320(a)(1) and 2.

**FORFEITURE ALLEGATION**

The allegations contained in Counts 1 through 3 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture. Upon conviction of the offenses alleged in Counts 1 through 3, KARA SUNEVA ALLEN (a/k/a KARA SUNEVA MITCHELL) shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2323, any article, the making or trafficking of which is prohibited under Title 18, United States Code, Section 2320; any property used, or intended to be used, in any manner or part to commit or facilitate the offense; and any property constituting or derived from any proceeds obtained directly or indirectly as a result of the offense.

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1       **Substitute Assets.** If any of the above-described forfeitable property, as a result of  
2 any act or omission of the defendant,

- 3           a.     cannot be located upon the exercise of due diligence;  
4           b.     has been transferred or sold to, or deposited with, a third party;  
5           c.     has been placed beyond the jurisdiction of the Court;  
6           d.     has been substantially diminished in value; or,  
7           e.     has been commingled with other property which cannot be divided  
8                 without difficulty,

9 it is the intent of the United States to seek the forfeiture of any other property of the  
10 defendant, up to the value of the above-described forfeitable property, pursuant to  
11 Title 21, United States Code, Section 853(p).

12  
13                               A TRUE BILL:

14  
15                               DATED: 01 JUNE 2022

16  
17                               *Signature of Foreperson redacted pursuant*  
18                               *to the policy of the Judicial Conference of*  
19                               *the United States.*

20                               \_\_\_\_\_  
21                               FOREPERSON

22                               \_\_\_\_\_  
23                               NICHOLAS W. BROWN  
24                               United States Attorney

25                               \_\_\_\_\_  
26                               THOMAS WOODS  
27                               Assistant United States Attorney

28                               \_\_\_\_\_  
JESSICA M. LY  
Special Assistant United States Attorney